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*Attorneys for Defendants Lockton Insurance Company
LLC and Lockton Companies LLC – Pacific Series*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CEDRIC DE LISSER, CHRISTOPHER MOSER,
and MICHAEL MICHELIN, in their capacity as
the Trustees of the Cred Liquidation Trust,

Plaintiffs,

v.

LOCKTON INSURANCE COMPANY LLC,
d/b/a LOCKTON INSURANCE BROKERS
LLC, a Missouri limited liability company;
LOCKTON COMPANIES, LLC – PACIFIC
SERIES, d/b/a LOCKTON INSURANCE
BROKERS LLC, a Missouri limited liability
company; and DOES 1-10, inclusive.

Defendants.

Case No. 3:23-cv-00243-JD

**[Removal from Superior Court of
California, County of San Francisco,
Case No. CGC-22-603638]**

**STIPULATION TO REQUEST THE
RESCHEDULING OF THE CASE
MANAGEMENT CONFERENCE**

State Action Filed: December 22, 2022

Pursuant to Civil Local Rules 6-1(a) and 7-12, Plaintiffs Cedric De Lisser, Christopher Moser, and Michael Michelin, in their capacity as the Trustees of the Cred Liquidation Trust (collectively, “Plaintiffs”) and Defendants Lockton Insurance Company LLC, d/b/a Lockton Insurance Brokers LLC and Lockton Companies, LLC – Pacific Series, d/b/a Lockton Insurance Brokers LLC (together, “Defendants”), through their respective undersigned counsel, hereby stipulate as follows:

WHEREAS, Plaintiffs commenced this litigation against Defendants in the Superior Court of California, County of San Francisco;

WHEREAS, the Action was removed to this Court on January 18, 2023 by Defendants’ invocation of 28 U.S.C. §§ 1334(b), 1446, and 1452(a);

WHEREAS, Plaintiffs do not believe there is a basis for removal;

WHEREAS, Plaintiffs filed a *Motion to Remand or in the Alternative for Equitable Remand* (the “Motion to Remand”) on February 17, 2023, Defendants filed their Opposition on March 3, 2023, and Plaintiffs filed a Reply on March 10, 2023;

WHEREAS, the Motion to Remand is scheduled for hearing before this Court on March 30, 2023;

WHEREAS, the Parties’ Initial Case Management Conference is scheduled before this Court for April 13, 2023;

WHEREAS, the Parties agree that both sides will be able to more effectively meet and confer regarding the Joint Case Management Statement and related issues once the Court has heard the Motion to Remand;

THEREFORE the Parties respectfully jointly request that:

1. The Initial Case Management Conference scheduled for April 13, 2023 be rescheduled to May 11, 2023 at 10:00 A.M. or on a date and time thereafter at the Court’s convenience.

DATED: March 22, 2023

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*Special Counsel to Trustees of the Cred Inc.
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DATED: March 22, 2023

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*Attorneys for Defendants Lockton Insurance Company
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[PROPOSED] ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

SO ORDERED this ____ Day of _____, 2023.

UNITED STATES DISTRICT JUDGE